

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, : Civil No. 07-CV-11275 (JGK)

Plaintiff,

: **MOTION TO ADMIT**
: **COUNSEL *PRO HAC VICE***
: **PURSUANT TO LOCAL RULE 1.3(C)**

V.

DARRYL A. GOLDSTEIN and
CHRISTOPHER L. O'DONNELL,

Defendants.
-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Tyler E. Gellasch, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Daniel T. Brown
Mayer Brown LLP
1909 K Street, N.W.
Washington, D.C. 20006
Tele: (202) 263-3388
Fax: (202) 263-5388.

Daniel T. Brown is a member in good standing of the Bar of the State of Illinois and the Bar of the District of Columbia. There are no pending disciplinary proceedings against Daniel T. Brown in any State or Federal court.

DATED: February 28, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tyler E. Gellasch", written in a cursive style.

Tyler E. Gellasch (TG-3227)

Mayer Brown LLP

1909 K Street, N.W.

Washington, D.C. 20006

Tele: (202) 263-3227

Fax: (202) 263-5227

Counsel for Defendant Christopher L. O'Donnell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	: Civil No. 07-CV-11275 (JGK)
Plaintiff,	:
	: DECLARATION OF TYLER
	: GELLASCH IN SUPPORT OF
	: MOTION TO ADMIT
	: COUNSEL <i>PRO HAC VICE</i>
V.	:
	:
DARRYL A. GOLDSTEIN and	:
CHRISTOPHER L. O'DONNELL,	:
Defendants.	:
-----X	

I, Tyler Gellasch, declare as follows:

1. I am a member of the bar of this Court and an associate of the firm of Mayer Brown LLP, counsel for Defendant Christopher L. O'Donnell in this action.
2. I submit this Declaration in support of my motion to admit Daniel T. Brown *pro hac vice* pursuant to Local Civil Rule 1.3(c) of this Court.
3. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing in this Court.
4. Mr. Brown is a partner of Mayer Brown LLP, in Washington, D.C.
5. By nature of the fact that we have been associated with Mayer Brown LLP for a number of years, I am familiar with Mr. Brown and his reputation. It is my opinion that Mr. Brown is, and has a reputation for being, a lawyer of good character, competence and experience. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. This application also includes a declaration by Mr. Brown describing his bar admissions, and good standing, and his experience and familiarity with the Judicial Code governing practice in the United States District Courts, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the Local Rules governing practice in this Court.

7. A certificate of Mr. Brown's membership in good standing of the bar of the State of Illinois is annexed to his declaration as Exhibit A, which is submitted in further support of the motion.

8. A certificate of Mr. Brown's membership in good standing of the bar of the District of Columbia is annexed to his declaration as Exhibit B, which is submitted in further support of the motion.

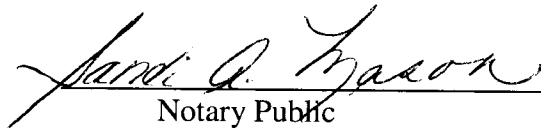
9. For the foregoing reasons, I respectfully request that the motion to admit Daniel T. Brown, *pro hac vice*, to represent Defendant Christopher L. O'Donnell in the above-captioned matter be granted.

10. For the Court's convenience, a copy of a proposed order granting the motion is attached to this declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 28, 2008.


Tyler E. Gellach (TG-3227)

Sworn to before me this
28 day of February, 2008


Notary Public

SANDI A. MASON
Notary Public, District of Columbia
My Commission Expires March 14, 2011

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
SECURITIES AND EXCHANGE COMMISSION, : Civil No. 07-CV-11275 (JGK)
:
Plaintiff, : **DECLARATION OF DANIEL**
:
:
:
v. : **BROWN IN SUPPORT OF**
:
:
:
DARRYL A. GOLDSTEIN and : **MOTION TO ADMIT**
:
CHRISTOPHER L. O'DONNELL, : **COUNSEL *PRO HAC VICE***
:
Defendants. :
-----X


I, Daniel T. Brown, declare as follows:

1. I am a member of the firm of Mayer Brown LLP, counsel for Defendant Christopher L. O'Donnell in the above-captioned action.
2. I submit this Declaration in support of Tyler Gellasch's motion to admit counsel *pro hac vice* pursuant to Local Civil Rule 1.3(c) of this Court.
3. I have been admitted to practice law in the state of Illinois since 1994, and I am currently in good standing with the bar of the State of Illinois. A certificate of good standing from the State Bar of Illinois is attached hereto as Exhibit A.
4. I have been admitted to practice law in the District of Columbia since 2001, and I am currently in good standing with the bar of the District of Columbia. A certificate of good standing from the District of Columbia is attached hereto as Exhibit B.
5. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal

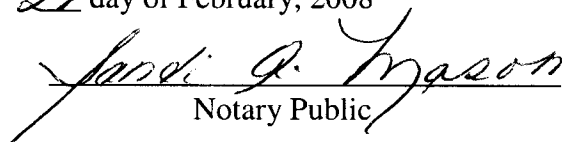
Rules of Civil Procedure; (c) the Federal Rules of Evidence; and (d) the Local Rules of this Court.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 28, 2008.


Daniel T. Brown

Sworn to before me this
28 day of February, 2008


Notary Public

SANDI A. MASON
Notary Public, District of Columbia
My Commission Expires March 14, 2011

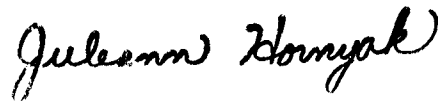
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

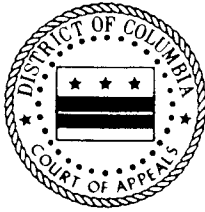
Daniel Thomas Brown

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 1994 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, February 27, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

DANIEL T. BROWN

was on the 6TH day of AUGUST, 2001
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
February 26, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Chiles
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	: Civil No. 07-CV-11275 (JGK)
	:
Plaintiff,	:
	:
v.	: ORDER GRANTING MOTION TO
	: ADMIT COUNSEL <i>PRO HAC VICE</i>
	:
	:
DARRYL A. GOLDSTEIN and	:
CHRISTOPHER L. O'DONNELL,	:
	:
Defendants.	:
-----X	

Upon motion by Tyler E. Gellasch, counsel for Defendant Christopher L. O'Donnell in the above-captioned action, and Mr. Gellasch's affidavit in support;

IT IS HEREBY ORDERED that:

Daniel T. Brown
Mayer Brown LLP
1909 K Street, N.W.
Washington, D.C. 20006
Tele: (202) 263-3388
Fax: (202) 263-
dtbrown@mayerbrown.com

is hereby is admitted *pro hac vice* as counsel to Defendant Christopher L. O'Donnell in connection with this action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: February __, 2008

SO ORDERED:

Honorable John G. Koeltl
United States District Judge

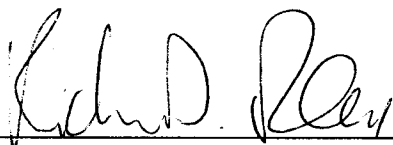
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February 2008, a true and complete copy of the foregoing Motion to Admit Counsel *Pro Hac Vice* was served by overnight delivery on the following:

Christopher R. Conte, Esquire
Mark J. Kreitman, Esquire
Jordan A. Thomas, Esquire
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Robert S. Blackburn, Esquire
U.S. Securities and Exchange Commission
3 World Financial Center
Room 4300
New York, NY 10281

Lawrence H. Cooke, II
VENABLE LLP
The Chrysler Building
405 Lexington Ave, 61st Floor
New York, NY 10174


Richard Reed
Mayer Brown LLP
1909 K Street, N.W.
Washington, DC 20006
(202) 263-3000